

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	Case No. 23-34815 (JPN)
GALLERIA 2425 Owner, LLC.	§	
Debtor	§	Chapter 11

**EMERGENCY MOTION TO CONTINUE HEARING ON  
CONFIRMATION OF PLAN FILED BY NATIONAL BANK OF  
KUWAIT AND JOINT PLAN PROPOSED BY 2425 WL, LLC AND  
DEBTOR**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW 2425 WL, LLC (“Movant”) and files this Motion to Continue Hearings on Confirmation of Plan filed by National Bank of Kuwait and Joint Plan filed by 2425 WL, LLC and Debtor and would show as follows:

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY**

Emergency (or expedited) relief has been requested. If the Court considers the motion on an emergency (or expedited) basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency (or expedited) consideration is not warranted, you should file an immediate response.

1. The Court has set a hearing on confirmation of the Plan filed by National Bank of Kuwait and the Fifth Amended Joint Plan filed by 2425 WL, LLC on June 17, 2024 at 9:00 a.m.
2. 2425 WL, LLC has objected to confirmation of the Bank’s plan and expects the Bank to object to the Joint Plan.
3. Ali Choudhri is the principal of both the Debtor and 2425 WL, LLC. On Sunday June 2, 2024, Mr. Choudhri was rushed to the hospital. He was diagnosed with a stroke. Mr. Choudhri is presently admitted to the stroke unit of Methodist

Hospital. As a result, he is not presently able to assist with preparation for the two confirmation hearings and his ability to physically attend the hearings is unknown.

4. On June 3 at 7:33 a.m., I contacted Andrew Troop, Charles Conrad and R.J. Shannon and informed them of Mr. Choudrhi's condition and told them I would be seeking a continuance. I did not receive a response other than Mr. Shannon asked what I would be seeking to continue.
5. Based on prior pleadings in this case, I know that NBK's lawyers have the following conflicts:  
  
Charles Conrad: June 19-July 1  
Andrew Troop June 28-July 5
6. While it is not ideal, the confirmation hearings could be scheduled together with the sale hearing on July 8, 2024 at 9:00 a.m. Alternatively, the sale hearing could be continued to a later date.
7. This motion is supported by the Declaration of Stephen W Sather.

Respectfully Submitted,

**BARRON & NEWBURGER, P.C.**  
7320 N. MoPac Expwy., Suite 400  
Austin, Texas 78731  
Tel: (512) 476-9103

By: /s/ Stephen W. Sather  
Stephen W. Sather  
State Bar No.17657520

**ATTORNEYS FOR  
CREDITOR, 2425 WL,LLC**

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Response was served on the 4th day of June, 2024 to the parties on the attached list.

/s/ Stephen W. Sather  
Stephen W. Sather

### **DECLARATION OF STEPHEN W. SATHER**

1. My name is Stephen W. Sather. I am over the age of 18 years and am fully competent to give this Declaration. I have personal knowledge of the facts stated herein and they are true and correct. I give this Declaration under penalty of perjury pursuant to 28 U.S.C. Sec. 1746.
2. At approximately 6:00 a.m. on June 3, 2024, I learned that Ali Choudhri had been admitted to the hospital with a stroke on Sunday June 2, 2024. Mr. Choudhri's assistance and presence at hearings is necessary for my preparation for the confirmation hearings.
3. I informed Mr. Troop, Mr. Conrad and Mr. Shannon that I would be requesting a continuance at 7:33 a.m and included a medical record relating to Mr. Choudhri. I have not included that document in the record to protect Mr. Choudhri's privacy.. I was apparently not clear that I was seeking a continuance of the confirmation hearings because Mr. Shannon responded back and asked what I wanted continued. I informed him that it was the confirmation hearings. I know from prior pleadings that Mr. Conrad is not available from June 19-July 1 and that Mr. Troop is not available from June 28-July 5
4. None of the attorneys responded with dates that they would be available for a continued hearing. This may be because I was not clear or because they have not seen the email yet. I did speak with Mr. Conrad about Mr. Choudhri's condition on June 3 and have been in email contact with Mr. Shannon about this case.

Dated: June 4, 2024.

I declare the above and foregoing to be true and correct under penalty of perjury.

/s/Stephen W. Sather  
Stephen W. Sather

Label Matrix for local noticing  
0541-4  
Case 23-34815  
Southern District of Texas  
Houston  
Thu May 30 08:45:52 CDT 2024

2425 WL, LLC  
2425 West Loop South 11th floor  
Houston, TX 77027-4304

CC2 TX, LLC  
c/o Howard Marc Spector  
Spector & Cox, PLLC  
12770 Coit Road Suite 850  
Dallas, TX 75251-1364

City of Houston  
Linebarger Goggan Blair & Sampson LLP  
c/o Tara L. Grundemeier  
PO Box 3064  
Houston, TX 77253-3064

Galleria 2425 Owner, LLC  
1001 West Loop South 700  
Houston, TX 77027-9084

(p)HARRIS COUNTY ATTORNEY'S OFFICE  
P O BOX 2928  
HOUSTON TX 77252-2928

Hayward PLLC  
c/o Melissa Hayward  
10501 N. Central Expy., Ste. 106  
Dallas, TX 75231-2203

Houston Community College System  
Linebarger Goggan Blair & Sampson LLP  
c/o Tara L. Grundemeier  
PO Box 3064  
Houston, TX 77253-3064

Houston ISD  
Linebarger Goggan Blair & Sampson LLP  
c/o Tara L. Grundemeier  
PO Box 3064  
Houston, TX 77253-3064

National Bank of Kuwait, S.A.K.P., New York

4  
United States Bankruptcy Court  
PO Box 61010  
Houston, TX 77208-1010

2425 WL, LLC  
13498 Pond Springs Rd.  
Austin, TX 78729-4422

2425 West Loop, LLC  
2000 Hughes Landing Blvd., Suite 815  
The Woodlands, Texas 77380-4142

ADT  
PO Box 382109  
Pittsburgh, PA 15251-8109

Ali Choudhry  
1001 West Loop South 700  
Houston, TX 77027-9084

Arin-Air, Inc.  
5710 Brittmoore Rd. #13  
Houston, TX 77041-5627

Ash Automated Control Systems, LLC  
PO Box 1113  
Fulshear, TX 77441-2013

CC2 TX, LLC  
14800 Landmark Blvd., Suite 400  
Dallas, TX 75254-7598

CFI Mechanical, Inc  
6109 Brittmoore Rd  
Houston, TX 77041-5610

CNA Insurance Co  
PO Box 74007619  
Chicago, IL 60674-7619

Caz Creek Lending  
118 Vintage Park Blvd No. W  
Houston, TX 77070-4095

Cirro Electric  
PO Box 60004  
Dallas, TX 75266

City of Houston  
PO Box 1560  
Houston, TX 77251-1560

City of Houston  
c/o Tara L. Grundemeier  
Linebarger Goggan Blair & Sampson LLP  
PO Box 3064  
Houston, TX 77253-3064

Comcast  
PO Box 60533  
City of Industry, CA 91716-0533

Datawatch Systems  
4520 East West Highway 200  
Bethesda, MD 20814-3382

Environmental Coalition Inc  
PO Box 1568  
Stafford, TX 77497-1568

Ferguson Facilities Supplies  
PO Box 200184  
San Antonio, TX 78220-0184

Firetron  
PO Box 1604  
Stafford, TX 77497-1604

(p)FIRST INSURANCE FUNDING  
450 SKOKIE BLVD SUITE 1000  
NORTHBROOK IL 60062-7917

Gulfstream Legal Group  
1300 Texas St  
Houston, TX 77002-3509

H.N.B. Construction, LLC  
c/o Malcolm D. Dishongh  
PO Box 2347  
Humble, TX 77347-2347

HNB Construction, LLC  
521 Woodhaven  
Ingleside, TX 78362-4678

Hayward PLLC  
c/o Melissa S. Hayward  
10501 N. Central Expy., Ste. 106  
Dallas, TX 75231-2203

Houston Community College System  
c/o Tara L. Grundemeier  
Linebarger Goggan Blair & Sampson LLP  
PO Box 3064  
Houston, TX 77253-3064

Houston ISD  
c/o Tara L. Grundemeier  
Linebarger Goggan Blair & Sampson LLP  
PO Box 3064  
Houston, TX 77253-3064

Jetall Companies, Inc  
1001 West Loop South Ste 700  
Houston, TX 77027-9033

Kings 111 Emergency Communications  
751 Canyon Drive, Suite 100  
Coppell, TX 75019-3857

Lexitas  
PO Box Box 734298 Dept 2012  
Dallas, TX 75373-4298

Lloyd E. Kelley  
2726 Bissonnet Suite 240  
Houston, TX 77005-1352

Logix Fiber Networks  
PO Box 734120  
Dallas, TX 75373-4120

MacGeorge Law Firm  
2921 E 17th St Bldg D Suite 6  
Austin, TX 78702-1572

Mueller Water Treatment  
1500 Sherwood Forest Dr.  
Houston, TX 77043-3899

Naissance Galleria, LLC  
c/o Law Office of Nima Taherian  
701 N. Post Oak Rd. Ste 216  
Houston, TX 77024-3868

National Bank of Kuwait  
299 Park Ave. 17th Floor  
New York, NY 10171-0023

Nationwide Security  
2425 W Loop S 300  
Houston, TX 77027-4205

Nichamoff Law Firm  
2444 Times Blvd 270  
Houston, TX 77005-3253

Rodney L. Drinnon  
2000 West Loop S, Ste. 1850,  
Houston, Texas 77027-3744

TKE  
3100 Interstate North Cir SE 500  
Atlanta, GA 30339-2296

U.S. Trustee's Office  
515 Rusk, Suite 3516  
Houston, Texas 77002-2604

US Retailers LLC d/b/a Cirro Energy  
Attention: Bankruptcy Department  
PO Box 3606  
Houston, TX 77253-3606

US Trustee  
Office of the US Trustee  
515 Rusk Ave  
Ste 3516  
Houston, TX 77002-2604

Waste Management  
PO Box 660345  
Dallas, TX 75266-0345

Zindler Cleaning Service Co  
2450 Fondren 113  
Houston, TX 77063-2314

Ali Choudhri  
24256 West Loop South  
11th Floor  
Houston, TX 77027

Christopher R Murray  
Jones Murray LLP  
602 Sawyer St  
Ste 400  
Houston, TX 77007-7510

James Q. Pope  
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Ste 1125  
Houston, TX 77036-3343

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Baker & Associates  
950 Echo Lane  
Suite 300  
Houston, TX 77024-2824

Rodney Drinnon  
McCathern Houston  
2000 W Loop S  
Ste. 1850  
Houston, TX 77027-3744

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Harris County, ATTN: Property Tax Division	First Insurance Funding	(d)Harris County Tax Assessor
Harris County Attorney's Office	450 Skokie Blvd	PO Box 4622
P.O. Box 2928	Northbrook, IL 60062	Houston, TX 77210
Houston, TX 77252-2928 United States		

(d)Harris County, et al  
PO Box 2928  
Houston, TX 77252

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)2425 West Loop, LLC	(u)Sonder USA Inc.	(d)Arin-Air, LLC
		5710 Brittmoore Rd. #13
		Houston, TX 77041-5627

(du)Sonder USA Inc.	(u)Jack Rose	End of Label Matrix	
		Mailable recipients	58
		Bypassed recipients	5
		Total	63